The air quality section of the EIR includes a summary of local and regional air quality conditions and an analysis of the potential air quality impacts associated with the proposed project. This section is largely based on the air quality technical report prepared by Illingworth and Rodkin in March 2005. The air quality analysis is contained in Appendix C of this EIR. Both short-term emissions (e.g. site grading and construction), as well as long-term effects related to the ongoing operation (e.g. mobile source and stationary source emissions) of the proposed project are evaluated. Mitigation measures are recommended as necessary to reduce significant adverse air quality impacts.

3.3.1 Environmental Setting

AIR POLLUTION PROPERTIES, EFFECTS AND SOURCES

Air quality at a given location can be described by the concentrations of various pollutants, or harmful substances, in the atmosphere. Pollutants can be defined as two general types: 1) criteria pollutants and 2) toxic compounds. Criteria pollutants are pollutants for which national and state ambient air quality standards have been set. Toxic compounds, known as hazardous air pollutants by the federal government and as toxic air contaminants by the State of California, are toxic substances that have been determined to present some level of cancer, acute or chronic health risk to the general public.

The most common and widespread air pollutants of concern include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and suspended particulate matter (PM_{10} and $PM_{2.5}$). Sulfur dioxide and nitrous oxides produced by the burning of fossil fuels has contributed to acid rain, haze and smog. The largest source of these pollutants is automobile emissions. The sulfur in diesel fuel is also a major contributor to smog.

Poor air quality can cause health problems, including burning eyes and nose, itchy irritated throat and difficulty breathing. Above certain concentrations and durations, air pollutants can be extremely dangerous and can cause severe injury or death. Air pollution can also damage the environment and property. Plants and animals and their habitats can be harmed by air pollution. Secondary effects such as acid rain can cause damage to buildings, monuments and other structures. Air pollution can also result in haze, which reduces visibility and can sometimes interfere with aviation.

Criteria Air Pollutants and Effects

Air quality studies generally focus on five pollutants that are most commonly measured and regulated: CO, O_3, NO_2, SO_2, and suspended particulates (PM_{10} and $PM_{2.5}$).

Carbon Monoxide

Carbon Monoxide is a colorless and odorless gas that interferes with the transfer of oxygen to the brain. It can cause dizziness and fatigue, and impair central nervous system functions. CO is emitted almost exclusively from the incomplete combustion of fossil fuels. Automobile exhausts release approximately 70 percent of the CO in the Bay Area. A substantial amount also comes from burning wood in fireplaces and wood stoves. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. The highest CO concentrations measured in the Bay Area are typically recorded during the winter.

Ozone

Ozone, a colorless toxic gas, is the chief component of urban smog. Ozone enters the blood stream and interferes with the transfer of oxygen, depriving sensitive tissues in the heart and brain of oxygen. Although O_3 is not directly emitted, it forms in the atmosphere through a chemical reaction between reactive organic gas (ROG) and nitrogen oxides (NO_X) under sunlight. ROG and NO_x are primarily emitted from automobiles and industrial sources. O_3 is present in relatively high concentrations within the Bay Area, and the damaging effects of photochemical smog are generally related to the concentration of O_3. Highest O_3 concentrations occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies.

Nitrogen Dioxide

NO_2, a reddish-brown gas, irritates the lungs. It can cause breathing difficulties at high concentrations. Like O_3, NO_2 is not directly emitted, but is formed through a reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as nitrogen oxides (NO_x) and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10} (see discussion of PM_{10} below).

Sulfur Oxides

Sulfur oxides, primarily SO_2, are a product of high-sulfur fuel combustion. The main sources of SO_2 are coal and oil used in power stations, in industries, and for domestic heating. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 concentrations have been reduced to levels well below the state and national standards, but further reductions in emissions are needed to attain compliance with standards for PM_{10}, of which SO_2 is a contributor.

Suspended Particulate Matter

Particulate matter pollution consists of very small liquid and solid particles suspended in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter also forms when industry and gaseous pollutants undergo chemical reactions in the atmosphere. Respirable particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$) represent fractions of particulate matter. PM_{10} refers to particulate matter less than 10 microns in diameter and $PM_{2.5}$ refers to particulate matter that is 2.5 microns or less in diameter. Major sources of PM_{10} include motor vehicles; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. $PM_{2.5}$ results primarily from diesel fuel combustion (from motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. PM_{10} and $PM_{2.5}$ pose a greater health risk than larger-size particles, because these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract increasing the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Whereas, larger particles tend to collect in the upper portion of the respiratory system, $PM_{2.5}$ are so tiny that they can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

Toxic Air Contaminants

Toxic Air Contaminants (TACs) are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer) and include, but are not limited to, the criteria air pollutants listed above. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TACs (based on the statewide average). According to the California Air Resources Board (CARB), diesel exhaust is a complex mixture of gases, vapors and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the state's Proposition 65 or under the federal Hazardous Air Pollutants programs. California has adopted a comprehensive diesel risk reduction program. The U.S. Environmental Protection Agency (U.S. EPA) has adopted low sulfur

diesel fuel standards that will reduce diesel particulate matter substantially. These go into effect in June 2006.

In cooler weather, smoke from residential wood combustion can be a source of TACs. Localized high TAC concentrations can result when cold stagnant air traps smoke near the ground and, with no wind, the pollution can persist for many hours. This occurs in sheltered valleys during the winter. Woodsmoke also contains a significant amount of PM_{10} and $PM_{2.5}$. Woodsmoke is an irritant and is implicated in worsening asthma and other chronic lung problems.

CLIMATE AND TOPOGRAPHY

The climate in the City of Morgan Hill is characterized by warm dry summers with abundant sunshine and cool moist winters with variable cloudiness. The proximity of the Pacific Ocean and San Francisco Bay has a moderating influence on the climate. The City of Morgan Hill lies in the southern portion of the Santa Clara Valley, which is generally oriented from the northwest to the southeast. This valley is bounded to the north by the San Francisco Bay, and by mountains to the east, south, and west. The surrounding terrain greatly influences winds in the valley, resulting in a prevailing wind that follows along the valley's northwest-southeast axis. During the afternoon and early evening, a north-northwesterly sea breeze often flows through the valley, and a light south-southeasterly drainage flow often occurs during the late evening and early morning hours.

Typical summer maximum temperatures for the region are in the 80's, while winter maximum temperatures are in the high 50's or low 60's. Minimum temperatures usually range from the high 50's in the summer to the upper 30's and low 40's in the winter. Rainfall in the valley is approximately 20 to 25 inches per year, occurring mostly in the months of November through March.

Air quality standards for O_3 traditionally are exceeded when relatively stagnant conditions occur for periods of several days during the warmer months of the year. Weak wind flow patterns combined with strong inversions substantially reduces normal atmospheric mixing. Key components of ground-level ozone formation are sunlight and heat; therefore, significant ozone formation only occurs during the months from late spring through early fall. Prevailing winds during the summer and fall can transport and trap ozone precursors from the more urbanized portions of the Bay Area. Meteorological factors make air pollution potential in southern Santa Clara County quite high. The clear skies with relatively warm conditions that are typical in summer combine with transported and localized air pollutant emissions to elevate ozone levels. The up-slope and down-slope flows from the surrounding mountains may also re-circulate pollutants already present, contributing to the buildup of air pollution. Light winds and stable conditions during the late fall and winter contribute to the buildup of particulate matter from motor vehicles, agriculture, and wood burning in fireplaces and stoves.

AIR MONITORING DATA

Air quality in the region is controlled by the rate of pollutant emissions and meteorological conditions. Meteorological conditions such as wind speed, atmospheric stability, and mixing height may all affect the atmosphere's ability to mix and disperse pollutants. Long-term variations in air quality typically result from changes in air pollutant emissions, while frequent, short-term variations result from changes in atmospheric conditions. The San Francisco Bay Area is considered to be one of the cleanest metropolitan areas in the country with respect to air quality.

The project site is located in the San Francisco air basin, which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The BAAQMD monitors air quality conditions at over 30 locations throughout the Bay Area. The closest BAAQMD monitoring stations to the project site are located in San Martin and City of San José. Air pollutant concentrations measured at these stations are shown below in **Table 3.3-1**.

Ozone is the pollutant of most concern in the City of Morgan Hill, since prevailing summertime wind conditions tend to cause a build up in southern Santa Clara County. Ozone levels measured in San Martin, which is close to Morgan Hill, exceeded the state ozone standard from two to eight times between 2000-2003 and twice in 2004. The federal one-hour ozone standard has not been exceeded in the last five years at San Martin, but the eight-hour standard was exceeded from one to five days between 2000-2003, with no exceedances in 2004. Respirable Particulate Matter (PM_{10}) levels measured in San José are probably higher than those that would be measured in Morgan Hill due to the urban nature around the monitoring station. Measured exceedances of the state PM_{10} standard have occurred between two and four times each year in San José; however there were no exceedances in 2004. Exceedances of the federal $PM_{2.5}$ standard were not measured in the City of San José. In the more rural areas near Morgan Hill where PM_{10} is monitored, such as the cities of Watsonville and Hollister, there were no measured exceedances of the federal or state PM_{10} standard. The entire Bay Area, including the City of Morgan Hill, did not experience any exceedances of other air pollutants. **Table 3.3-2** reports the number of days that an ambient air quality standard was exceeded at the San Martin and San José stations located near Morgan Hill and in the entire Bay Area.

SENSITIVE RECEPTORS

Some groups of people are more affected by air pollution than others. CARB has identified the following people who are most likely to be affected by air pollution: children under 14, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and parks.

TABLE 3.3-1
HIGHEST MEASURED AIR POLLUTANT CONCENTRATIONS

Pollutant	Average Time	Measured Air Pollutant Levels				
		2000	2001	2002	2003	2004*
San Martin						
Ozone (O_3)	1-Hour	**0.11 ppm**	**0.12 ppm**	**0.12 ppm**	**0.11 ppm**	0.09 ppm
	8-Hour	**0.10 ppm**	**0.09 ppm**	**0.10 ppm**	**0.09 ppm**	0.08 ppm
Central San José						
Carbon Monoxide (CO)	8-Hour	6.3 ppm	5.1 ppm	4.5 ppm	4.0 ppm	2.9 ppm
Nitrogen Dioxide (NO_2)	1-Hour	0.11 ppm	0.11 ppm	0.08 ppm	0.09 ppm	0.07 ppm
	Annual	0.025ppm	0.024ppm	NA	0.021ppm	NA
San José – Tully Road						
Fine Particulate Matter ($PM_{2.5}$)	1-Hour	**69 ug/m^3**	**75 ug/m^3**	**70 ug/m^3**	**58 ug/m^3**	NA
	Annual	21 ug/m^3	23 ug/m^3	NA	**25 ug/m^3**	NA
Respirable Particulate Matter (PM_{10})	24-Hour	NA	NA	**58 ug/m^3**	**52 ug/m^3**	NA
	Annual	NA	NA	NA	**10 ug/m^3**	NA
Bay Area (Basin Summary)						
Ozone (O_3)	1-Hour	**0.15 ppm**	**0.13 ppm**	**0.16 ppm**	**0.13 ppm**	NA
	8-Hour	**0.11 ppm**	**0.10 ppm**	**0.11 ppm**	**0.10 ppm**	NA
Carbon Monoxide (CO)	8-Hour	6.3 ppm	5.1 ppm	4.5 ppm	4.0 ppm	NA
Nitrogen Dioxide (NO_2)	1-Hour	0.11 ppm	0.11 ppm	0.08 ppm	0.09 ppm	NA
	Annual	0.025ppm	0.024ppm	0.014ppm	0.021ppm	NA
Fine Particulate Matter ($PM_{2.5}$)	1-Hour	NA	NA	77 ug/m^3	56 ug/m^3	NA
	Annual	NA	NA	14 ug/m^3	11.7 ug/m^3	NA
Respirable Particulate Matter (PM_{10})	24-Hour	**76 μg/m^3**	**109 μg/m^3**	**84 μg/m^3**	**60 μg/m^3**	NA
	Annual	**24 ug/m^3**	**26 ug/m^3**	**25 ug/m^3**	**25 ug/m^3**	NA

* Partial data set for some pollutants

Note: ppm = parts per million
Values reported in bold exceed ambient air quality standard
NA = data not available
ug/m^3 = micrograms per cubic meter

Source: California Air Resources Board, 2004

TABLE 3.3-2
SUMMARY OF MEASURED AIR QUALITY EXCEEDANCES

Pollutant	Standard	Monitoring Station	Days Exceeding Standard				
			2000	2001	2002	2003	2004
Ozone (O_3)	NAAQS 1-hr	San Martin	0	0	0	0	0
		BAY AREA	3	1	2	1	--
	NAAQS 8-hr	San Martin	1	2	5	4	0
		BAY AREA	4	7	7	7	--
	CAAQS 1-hr	San Martin	4	7	8	2	2
		BAY AREA	12	15	16	19	--
Fine Particulate Matter (PM_{10})	NAAQS 24-hr	San José	0	0	0	0	0
		BAY AREA	0	0	0	0	0
	CAAQS 24-hr	San José	2	4	2	2	0
		BAY AREA	7	10	6	6	--
Fine Particulate Matter ($PM_{2.5}$)	NAAQS 24-hr	San José	NA	NA	NA	0	0
		BAY AREA	1	5	7	0	--
All Other (CO, NO_2, Lead, SO_2)	All Other	San José (Tully)	0	0	0	0	0
		BAY AREA	0	0	0	0	0

Source: Illingworth and Rodkin, Inc.

Note: NAAQS – National Ambient Air Quality Standard
CAAQS – California Ambient Air Quality Standard
CO – Carbon Monoxide
NO_2 – Nitrogen Dioxide
SO_2 – Sulfur Dioxide

EXISTING STRUCTURES

Bovee Environmental Management, Inc. conducted an asbestos reconnaissance of all the structures at the project site in February 2005. Based on the survey, it was determined that the three residences and associated outbuildings, which were constructed prior to 1978, include materials that contain asbestos, such as flooring materials, plaster, sheetrock/joint compound, insulators, exterior siding materials, and roofing materials.

3.3.2 REGULATORY SETTING

AMBIENT AIR QUALITY STANDARDS

The Federal Clean Air Act (CAA) governs air quality in the United States. In addition to being subject to federal requirements, air quality in California is also governed by more stringent regulations under the California CAA. At the Federal level, the U.S. EPA administers the CAA. The California CAA is administered by the CARB at the State level and by the Air Quality Management Districts at the regional and local levels. The BAAQMD regulates air quality at the regional level, which includes the nine-county Bay Area.

United States Environmental Protection Agency

The U.S. EPA is responsible for enforcing the Federal CAA. The U.S. EPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). The NAAQS are required under the 1977 CAA and subsequent amendments. The U.S. EPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. The agency has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission standards established by the CARB.

California Air Resources Board

In California, the CARB, which became part of the California Environmental Protection Agency (CalEPA) in 1991, is responsible for meeting the state requirements of the Federal CAA, administering the California CAA, and establishing the California Ambient Air Quality Standards (CAAQS). The California CAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. The CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles. The CARB regulates mobile air pollution sources, such as motor vehicles. The agency is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. The CARB established passenger vehicle fuel specifications, which became effective in March 1996. The CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county level.

National and State Ambient Air Quality Standards

As required by the Federal CAA, the NAAQS have been established for seven major air pollutants: CO, NO_x, O_3, PM_{10}, $PM_{2.5}$, sulfur oxides, and lead. Pursuant to the California CAA, the State of California has also established ambient air quality standards, known as the CAAQS. These standards are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles.

Both State and Federal standards are summarized in **Table 3.3-3**. The "primary" standards have been established to protect the public health. The "secondary" standards are intended to protect the nation's welfare and account for air pollutant effects on soil, water, visibility, materials, vegetation and other aspects of the general welfare. The use of the NAAQS or CAAQS is a function of the project approval process. The NAAQS is applicable if the project is federally funded or requires federal action. The proposed project is not federally funded and does not require federal action. Additionally, the CAAQS are more stringent than the NAAQS. Thus, the CAAQS are used as the comparative standard in the analysis contained in this report.

LOCAL AIR QUALITY STANDARDS

Bay Area Air Quality Management District

In 1955, the California Legislature created the BAAQMD. The agency is primarily responsible for assuring that the National and State ambient air quality standards are attained and maintained in the Bay Area. The BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, as well as many other activities. The BAAQMD has jurisdiction over much of the nine counties located in the Bay Area.

Attainment Status

Areas that do not violate ambient air quality standards are considered to have attained the standard. Violations of ambient air quality standards are based on air pollutant monitoring data and are judged for each air pollutant. The Bay Area as a whole does not meet State or Federal ambient air quality standards for ground level O_3 and State standards for fine particulate matter.

Under the Federal CAA, the U.S. EPA has designated the region as moderate non-attainment for ground level O_3. However, the U.S. EPA has recognized that the region has

not violated the 1-hour O_3 standard between 2000 and 2003 and has proposed to re-designate the Bay Area as a maintenance area. This is the first step towards designating the Bay Area as attainment of that standard. However, U.S. EPA has recently classified the region as marginally non-attainment for the newer more stringent 8-hour O_3 standard. The U.S. EPA requires the region to adopt a plan that will bring it into attainment with that standard by 2007. The Bay Area has met the CO standards for over a decade and is classified attainment maintenance by the U.S. EPA. The U.S. EPA grades the region unclassified for all other air pollutants, which include PM_{10} and $PM_{2.5}$.

TABLE 3.3-3
FEDERAL AND STATE AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards[1]	Federal Standards[2]	
		Concentration[3]	Primary[3,5]	Secondary[3,6]
Ozone (O_3)	1-hour	0.09 ppm (180 $\mu g/m^3$)	0.12 ppm (235 $\mu g/m^3$)	Same as Primary
	8-hour	--	0.08 ppm (157 $\mu g/m^3$)	Same as Primary
Respirable Particulate Matter (PM_{10})	Annual	20 $\mu g/m^3$	50 $\mu g/m^3$	Same as Primary
	24-hour	50 $\mu g/m^3$	150 $\mu g/m^3$	Same as Primary
Fine Particulate Matter ($PM_{2.5}$)	Annual	15 $\mu g/m^3$		Same as Primary
	24-hour	--	65 $\mu g/m^3$	Same as Primary
Carbon monoxide (CO)	8-hour	9.0 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)	None
	1-hour	20.0 ppm (23 mg/m^3)	35.0 ppm (40 mg/m^3)	–
Nitrogen dioxide (NO_2)	Annual	--	0.053 ppm (100 $\mu g/m^3$)	Same as Primary
	1-hour	0.25 ppm (655 $\mu g/m^3$)	–	–
Sulfur dioxide (SO_2)	Annual	--	0.03 ppm (80 $\mu g/m^3$)	–
	24-hour	0.04 ppm (105 $\mu g/m^3$)	0.14 ppm (365 $\mu g/m^3$)	–
	3-hour	--	--	0.5 ppm (1,300 $\mu g/m^3$)
	1-hour	0.25 ppm (655 $\mu g/m^3$)	–	–
Lead	30-Day	1.5 $\mu g/m^3$	-	–
	Quarterly	--	1.5 $\mu g/m^3$	Same as Primary
Visibly Reducing Particles	8-hour (10 AM to 6 PM PST)	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07 – 30 miles or more for Lake Tahoe) due to particulates when relative humidity is less than 70 percent.	No Federal Standards	

Pollutant	Averaging Time	California Standards[1]	Federal Standards[2]	
		Concentration[3]	Primary[3,5]	Secondary[3,6]
Sulfates	24-hour	25 $\mu g/m^3$		
Hydrogen Sulfide	1-hour	0.03 ppm (42 $\mu g/m^3$)		
Vinyl Chloride	24-Hour	0.01 ppm (26 $\mu g/m^3$)		

Source: CARB, 2004.
ppm = Parts per Million; $\mu g/m^3$ = Micrograms per Cubic Meter

Notes:

1. California Standards for O_3, CO (except Lake Tahoe), SO_2 (1 and 24 hour), NO_2, PM_{10}, $PM_{2.5}$, and visibly reducing particulates, are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards Section 70200 of Title 17 or the California Code of Regulations.
2. National standards (other than O_3, particulate matter, and those based on annual averages or annual arithmetric mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of daily concentrations, averaged over three years, are equal to or less than the standard.
3. Concentration expressed first in units in which it was promulgated. Equivalent units in parentheses are based upon a reference temperature of 25 degrees Celsius and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25 degrees Celsius and a reference pressure of 760 torr; ppm in the table refers to ppm by volume or micromoles of pollutant per mole of gas.
4. Any equivalent procedure which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of air quality standard may be used.
5. National Primary Standards. The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards. The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of pollution.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.
8. New federal 8-hour O_3 and fine particulate matter standards were promulgated by the U.S. EPA on July 18, 1997.
9. The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for implementation of control measures at levels below the ambient concentrations specified for these pollutants.

At the State level, the region is considered serious non-attainment for ground level O_3 and non-attainment for PM_{10}. CAAQS are more stringent than the NAAQS. The region is required to adopt plans on a triennial basis that show progress towards meeting the State O_3 standard. The area is considered attainment or unclassified for all other pollutants.

Bay Area Clean Air Plan

The BAAQMD along with the other regional agencies (i.e., Association of Bay Area Governments and the Metropolitan Transportation Commission) has prepared the *2001 Ozone Attainment Plan* to address the NAAQS for O_3. A *Carbon Monoxide Maintenance Plan* was also prepared in 1994 to demonstrate how the NAAQS for the CO standard will be maintained. Another plan, the *Bay Area Clean Air Plan*, was prepared to address the more stringent requirements of the California CAA with respect to O_3. This plan includes a

comprehensive strategy to reduce emissions from stationary, area, and mobile sources. The plan objective is to indicate how the region would make progress toward attaining the stricter state air quality standards, as mandated by the California CAA. The plan is designed to achieve a region-wide reduction of O_3 precursor pollutants through the expeditious implementation of all feasible measures. Air quality plans addressing the California CAA are developed about every three years. The latest plan, the *Bay Area 2000 Clean Air Plan*, proposes implementation of transportation control measures and programs such as *Spare the Air*. *Spare the* Air is a public outreach program designed to educate the public about air pollution in the Bay Area and promote individual behavior changes that improve air quality. Some of these measures or programs rely on local governments for implementation. The 2001 Ozone Plan included the strategy to attain the national ambient air quality standard for O_3. In 2004, U.S. EPA made a finding that the Bay Area has attained the national 1-hour O_3 standard. Because of this finding, the previous planning commitments in the *2001 Ozone Attainment Plan* are no longer required. The finding of attainment does not mean the Bay Area has been reclassified as an attainment area for the 1-hour standard. The region must submit a re-designation request to U.S. EPA in order to be reclassified as an attainment area. To address both the national and California ambient air quality standards, the BAAQMD is preparing an updated ozone strategy. In 2004, the BAAQMD held community meetings throughout the Bay Area to describe the draft control measures proposed for the Ozone Strategy and to invite public input. The draft Ozone Strategy, including proposed control measures, will be released for public review in the Summer of 2005.

A key element in air quality planning is to make reasonably accurate projections of future human activities that are related to air pollutant emissions. Most important is vehicle activity. The BAAQMD uses population projections made by the Association of Bay Area Governments and vehicle use trends made by the Metropolitan Transportation Commission to formulate future air pollutant emission inventories. The basis for these projections comes from cities and counties. In order to provide the best plan to reduce air pollution in the Bay Area, accurate projections from local governments are necessary. In general, when a General Plan is not consistent with these projections, they cumulatively reduce the effectiveness of air quality planning in the region. In the case of the proposed project, the project site has a General Plan designation of 'Commercial' in the *City of Morgan Hill General Plan* and a zoning designation of 'PUD (HC)' in the *City of Morgan Hill Planning and Zoning Codes*. The *City of Morgan Hill General Plan* designates the project site as the location of a sub-regional commercial site and the proposed project is consistent with the *City of Morgan Hill General Plan* designation. 3.3.3 Impacts and Mitigation Measures

STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines provides that, when available, the significance criteria established by the applicable air quality management district or air pollution

control district may be relied upon to make determinations of significance. The following are the significance criteria that the BAAQMD has established to determine project impacts:

Construction

The BAAQMD's approach to the CEQA analysis of construction impacts is to emphasize the implementation of effective and comprehensive control measures rather than detailed quantification of emissions. PM_{10} is the pollutant of greatest concern from construction activities. The *BAAQMD CEQA Guidelines* provide feasible control measures for construction emissions of PM_{10}. If the appropriate construction controls are implemented, air pollutant emissions for construction activities would be considered less than significant.

Operation

The proposed project would cause a significant air quality impact if it were to result in:

- Ozone precursor emissions (ROG and NO_x) and PM_{10} emissions from direct and indirect sources (non typical construction) that exceed the thresholds recommended by the BAAQMD. The BAAQMD recommends a threshold of 80 pounds per day or 15 tons per year for direct and indirect sources of ROG, NO_x, and PM_{10}.
- Emissions of CO cause a projected exceedance of the ambient CO state standard of 9.0 ppm for 8-hour averaging period.

METHODOLOGY

The impact analysis for this section relied on an air quality analysis prepared by Illingworth and Rodkin, Inc. (March 2005) and supplemented with information included in the traffic impact analysis prepared for the proposed project by Fehr and Peers Associates (May 2005). Using URBEMIS-2002, an air quality-modeling program released by CARB, quantities of ROG, NO_x, PM_{10}, and CO emissions were estimated by Ilingworth and Rodkin, Inc. Localized CO emissions were modeled using screening methods recommended by the BAAQMD that are based on the Caline4 Line-Source dispersion model.

PROJECT IMPACTS AND MITIGATION MEASURES

Short-Term Construction Emissions – Demolition of Existing Buildings

Impact 3.3-1 The proposed project would require the demolition of three residences and associated outbuildings (e.g. barns, sheds, and a water tower). Based on a site reconnaissance performed by Bovee Environmental Management Inc., asbestos is detectable in hazardous concentrations in

the structures at the project site. Therefore, demolition of these buildings has the potential to result in short-term air quality emissions, including the release of asbestos. This is considered a **potentially significant impact.**

Bovee Environmental Management, Inc. conducted an asbestos reconnaissance of all the structures at the project site in February 2005. Based on the survey, it was determined that structures on the project site which were constructed prior to 1978 include materials that contain asbestos, such as flooring materials, plaster, sheetrock/joint compound, insulators, exterior siding materials, and roofing materials. The release of asbestos containing materials during construction is considered a potentially significant impact.

The California Health and Safety Code requires that local agencies not issue demolition permits until an applicant has demonstrated compliance with notification requirements under applicable federal requirements regarding asbestos, lead-based paints and other potentially hazardous building materials.

The BAAQMD is vested by the California Legislature with authority to regulate airborne pollutants through both inspection and law enforcement. Regulation 11, Rule 2 of the BAAQMD requires that for every demolition (even when no asbestos is present), a notification must be made to the BAAQMD at least ten working days prior to commencement of either demolition or renovation of a building. This advance notification affords inspectors an opportunity to ensure that correct procedures are followed even if there is not any asbestos containing material present. This is to ensure that the structural part being demolished has been surveyed for asbestos containing material, which must be removed prior to demolition.

The proposed project must also comply with the California Occupational Safety and Health Administration (Cal/OSHA) regulations, standards and procedures and California Department of Health Services Lead Work Practice Standards. These regulations are designed to minimize worker and general public exposure to hazardous building materials. In addition, implementation of the following mitigation measures, which would require the project applicant to conduct a full site assessment and removal of asbestos-containing material prior to demolition, would reduce this impact to a **less than significant level.**

Mitigation Measure

MM 3.3-1 Prior to demolition of any on-site structures, the project applicant shall conduct a full site assessment for asbestos-containing materials (ACM) by a California Certified Asbestos Consultant for all structures proposed for demolition. Prior to demolition and site clearing activity, all identified ACM shall be removed by a licensed asbestos abatement contractor and clearance shall be obtained from the BAAQMD before proceeding with the

demolition. All ACM shall be transported to a disposal site approved to accept non-friable asbestos-containing waste.

Implementation of **Mitigation Measure 3.3-1** would reduce the effects of airborne asbestos to a **less than significant** level by requiring the project applicant to conduct a full-site assessment for asbestos-containing material prior to demolition of these buildings.

Short-Term Construction Emissions – Grading and Site Preparation

Impact 3.3-2 Construction activity during build-out of the proposed project would generate air pollutant emissions that could expose sensitive receptors to substantial pollutant concentrations. This is considered a **potentially significant impact.**

Build-out of the proposed project would involve construction that would be phased over several years. Construction would likely include initial grading of the project site and subsequent construction projects that could result in varying degrees of air quality emissions based on the size of the building, duration of construction, and proximity to sensitive receptors. Construction activities would generate pollutant emissions from the following construction activities: grading, construction worker commute trips to and from project sites, delivery and hauling of construction supplies and debris to and from the project site, and fuel combustion by on-site construction equipment. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants.

During construction, various diesel powered vehicles and equipment would be in use on the project site. In 1998, the CARB identified diesel exhaust as a Toxic Air Contaminant (TAC). Health risks from TAC are a function of both concentration and duration of exposure. Construction diesel emissions are temporary, affecting an area for a period of days or perhaps weeks. Additionally, construction related sources are mobile and transient in nature and the bulk of the emissions occurring within the project site would be between approximately 100 to 1,300 feet to the nearest sensitive receptors. Because of the short duration, potential health risks from construction emissions of diesel exhaust would represent a less than significant impact.

Suspended particulate matter (PM_{10}) is typically the most significant source of air pollution from construction, particularly during site preparation and grading. PM_{10} emissions from construction can vary daily, depending on various factors, such as the level of activity, type of construction activity taking place, the equipment being operated, weather conditions, and soil conditions. Typically, the BAAQMD does not require quantitative analysis for construction emissions. Rather the analysis is focused on identifying the most appropriate control measures. The BAAQMD has identified a set of feasible PM_{10} control measures for

construction activities. According to the *BAAQMD CEQA Guidelines,* if all of these control measures are implemented, a less than significant impact is expected for PM_{10} emissions.

Mitigation Measure

MM 3.3-2 The project applicant shall implement the following recommended BAAQMD dust control measures for construction emissions of PM_{10}. These dust control measures shall be implemented during construction for all phases of the proposed project:

- Sprinkle water to all active construction areas at least twice daily and more often when conditions warrant;
- Cover all trucks hauling soil, sand and other loose materials or require all trucks to maintain at least two feet of freeboard;
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites;
- Sweep daily all paved access roads, parking areas, and staging areas at construction sites;
- Sweep streets daily if visible soil material is carried onto adjacent public streets;
- Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas;
- Enclose, cover, water twice daily, or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.);
- Limit traffic speeds on unpaved roads to 15 miles per hour;
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways;
- Replant vegetation in disturbed areas as quickly as possible;
- Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site;
- Suspend grading activities when winds exceed 25 miles per hour (mph) and visible dust clouds cannot be prevented from extending beyond active construction areas; and
- Limit the area subject to excavation, grading and other construction activity at any one time.

Implementation of **Mitigation Measure 3.3-2** would reduce short-term construction impacts to a **less than significant** level by requiring implementation of a dust abatement program.

Long-Term Operational Emissions – Mobile Source Emissions

Impact 3.3-3 The proposed project would generate operational emissions that would affect long-term air quality. This would be a **significant impact.**

The proposed project would produce new automobile trips, generating emissions of criteria air pollutants, which could affect both regional and local air quality. The traffic study prepared by Fehr and Peers Associates, Inc (March 2005) estimates that the proposed project would generate approximately 22,009 daily weekday automobile trips at full build-out.

To evaluate the effects of the proposed project on regional air quality, emissions of ozone precursor pollutants, and PM_{10} were predicted using the URBEMIS-2002 Model, released by the CARB. The URBEMIS-2002 model is used to predict air pollutant emissions associated with mobile source emissions (e.g. automobile use). The methodologies used for these analyses along with modeling output are contained in Appendix C. The URBEMIS model combines assumptions for automobile activity (e.g., number of trips, vehicle mix, vehicle miles traveled, etc.) with vehicle emission factors. Project trip generation data provided by Fehr and Peers Associates, Inc. was used to input into the model. Potential emissions of ROG from a possible gas station were predicted and are added to the URBEMIS-2002 modeling results, as a worst-case analysis. Daily emissions of regional air pollutants from build-out of the proposed project are shown in **Table 3.3-4**.

TABLE 3.3-4
DAILY REGIONAL AIR POLLUTANT EMISSIONS

Description	Reactive Organic Gases (ROG) (lbs/day)	Nitrogen Oxides (NO_x) (lbs/day)	Particulate Matter (PM_{10}) (lbs/day)
Weekday Emissions	149*	135	110
Weekend Emissions	189*	177	146
BAAQMD Significance Thresholds	**80 lbs/day**	**80 lbs/day**	**80 lbs/day**

**Includes estimated 19 pounds per day of Reactive Organic Gas emissions associated with the optional gas station.*

The proposed project would result in worse case emissions of 189 lbs/day or ROG, 177 lbs/day of NO_x, and 146 lbs/day of PM_{10} during the weekend, which is considered a worst-case scenario. Project direct and indirect emissions of ozone precursor pollutants (i.e., ROG and NO_x) would exceed the thresholds established by the BAAQMD, of 80 lbs/day

for criteria pollutants, ROG, NO_x, and PM_{10}. PM_{10} emissions, which could lead to both regional and local air quality impacts, would also exceed the significance thresholds.

The proposed project generates more traffic on weekend days (i.e., Saturdays) and would result in greater emissions than on weekdays. In fact, emissions of ozone precursor pollutants and PM_{10}, which are significant on weekdays, would be over 30 percent higher on peak Saturdays. Emissions associated with the proposed project are estimated to be above the significance thresholds established by the BAAQMD, and therefore, would be considered significant. Implementation of the following mitigation measure would reduce operational emissions.

Mitigation Measure

MM 3.3-3 A facilities 'trip reduction plan' shall be implemented by the project applicant to reduce single occupant vehicle commute trips by employees and promote non-auto travel by both employees and patrons. The facilities trip reduction plan shall include, but not be limited to elements that would reduce traffic, and thus air pollutant emissions as described below:

- Provide one bus stop/shelter with pedestrian access to the project site. Implementation of this measure could reduce project emissions by approximately two percent.
- Bicycle amenities should be provided at the project site once the proposed project is in operation. Bicycle amenities could include secure bicycle parking for employees, bicycle racks for customers, and bike lane connections. This vehicle trip reduction measure may reduce emissions associated with the proposed project by approximately two percent.
- Pedestrian facilities should link the future transit stop and access roadways to the major sites uses. This trip reduction measure may reduce emissions by approximately one percent.
- Designate a portion of the parking lot for weekday 'park-and-ride' parking spaces (the excess between weekday peak and weekend peak) which would reduce emissions from traffic to the project site by allowing commuters to park their car and carpool or take transit.
- Require employers at the project site to post transit rates and scheduling information on bulletin boards. This vehicle trip reduction measure may reduce emissions by one percent.

Preparation and implementation of a trip reduction plan designed to reduce traffic congestion in the project area could result in lower emissions from vehicle travel. The

amount of congestion relief and related total emission reduction is unknown. Therefore long-term operational emissions associated with the proposed project would remain **significant and unavoidable**, even with full effectiveness of the mitigation measure.

Long-Term Operational Emissions - Localized Emissions of Carbon Monoxide

Impact 3.3-4 The proposed project would result in an increase in carbon monoxide concentrations at land uses near roadways and intersections. This is considered a **less than significant impact**.

The primary mobile source pollutant of local concern is Carbon Monoxide (CO). Localized concentrations of CO are a direct function of vehicle idling time and thus, traffic flow conditions. Carbon Monoxide concentrations close to congested roadways or intersections may reach unhealthy levels, affecting local sensitive receptors (e.g. residents, school children, hospital patients, the elderly). Sensitive receptors in the vicinity of the project site include primarily residential uses, which are located between 100 and 1,300 feet from the project site. Under normal meteorological conditions, CO transport is extremely limited and disperses rapidly from the source. Typically, areas of high CO concentrations or "hot spots" are associated with signalized intersections operating at poor levels of service (LOS E or worse).

The traffic impact analysis prepared by Fehr and Peers Associates (March 2005) examined project and cumulative impacts associated with the implementation of the proposed project. Intersections along Cochrane Road would be most affected by the proposed project, including the Cochrane Road/Northbound U.S. Highway 101 intersection, the Cochrane Road/Southbound U.S. Highway 101 intersection, and the Cochrane Road/Butterfield Boulevard intersection. Congested intersections with a large volume of traffic have the greatest potential to cause high-localized concentrations of CO.

Carbon monoxide concentrations were predicted for intersections along Cochrane Road. There are one and eight-hour standards for CO. The eight-hour standard is the most stringent and is always used if the one-hour standard is exceeded. Therefore, the proposed project was evaluated against the eight-hour standard.

Carbon Monoxide concentrations were modeled using screening methods recommended by the BAAQMD that are based on the Caline4 Line-Source dispersion model. This method uses traffic volumes, emissions, meteorology, and the roadway/receptor geometry. For this assessment, meteorological conditions most conducive for high CO concentrations in the Bay Area, peak-hour traffic conditions (i.e. evening period), slow traffic speeds and emission factors generated by the CARB emission factor model (i.e., EMFAC2002) were used as input to the model. Modeled concentrations were added to background levels to predict total CO concentrations. This assessment was conducted for existing conditions, project conditions (full build out expected in 2007), and under cumulative conditions that

would occur beyond 2010. The screening method is designed to be a conservative method of determining whether or not a project may cause an exceedance of the CO air quality standard. If the screening method predicts significant levels, then a more-refined analysis may be conducted that would more accurately predict CO levels, which would likely be lower. Results of the predicted eight-hour CO levels at the three intersections are shown in **Table 3.3-5.**

TABLE 3.3-5
PREDICTED 8-HOUR WORST CASE CARBON MONOXIDE LEVELS

Description	2005 Existing	Project Conditions 2007 (ppm)	Cumulative with Project 2010 (ppm)	General Plan Buildout 2025 (ppm)
Cochrane Road/ U.S. Highway 101 Northbound	5.7	6.8*	6.0*	4.2
Cochrane Road/U.S. Highway 101 Southbound	6.8	7.4*	6.4 *	4.3
Cochrane Road/Butterfield Boulevard	5.1	5.6*	5.1 *	4.2
Significance Thresholds (CAAQS)	**9.0 ppm for eight hour exposure**			

* Future CO concentrations are anticipated to decrease over time due to reductions in emission factors associated with cleaner less polluting vehicles.

Source: Illingworth and Rodkin, Inc.

As shown in **Table 3.3-5**, the screening analysis indicates that modeled existing eight-hour CO concentrations are currently below CAAQS. Predicted eight-hour CO concentrations with the project are predicted to remain below CAAQS. Although traffic will increase under cumulative conditions, CO concentrations are anticipated to decrease because of cleaner less-polluting vehicles using the roadways. This impact on local air quality resulting from the proposed project is considered a **less than significant** impact.

Long-term Operational Emissions – Stationary Sources

Impact 3.3-5 The proposed project includes a possible fuel station, which could result in the emission of toxic air contaminants, including benzene. This is considered a **less than significant** impact.

As shown on the project site plan in Figure 2-8, the proposed project may include a 12-pump fuel station as an alternative to a retail pad near the southern portion of the project site, which would be a source of toxic air contaminants, primarily in the form of gasoline vapor emissions from the storage and dispensing of gasoline.

The BAAQMD rules and regulations, which apply to fueling stations, control gasoline vapor emissions from gasoline dispensing facilities. This includes a requirement that the operator obtain an 'Authority to Construct' permit from the BAAQMD. This permit requirement

ensures that the required Vapor Recovery Systems are installed and are operating effectively and that and the project would not result in adverse air quality impacts to the public. Once installed, the BAAQMD will issue a temporary use permit while it conducts tests to certify that the systems are 95 percent efficient as required by the CARB. The BAAQMD will then issue a Permit to Operate, and will continue to conduct periodic tests to make sure the systems are continuing to meet the mandated performance standards.

Gasoline vapors are released during the filling of both underground storage tanks and the transfer of fuel from those tanks to individual vehicles. These vapors contain TACs such as benzene. The project applicant would be required to obtain an air quality permit for the fuel station from the BAAQMD, which would ensure that the required Vapor Recovery Systems are installed and are operating effectively. The BAAQMD will only issue permits to construct and operate a fuel station if analyses conducted during the permit phase of the project demonstrate that the associated cancer risks are negligible. Therefore, if the proposed project includes a 12-pump fuel station as an alternate to a retail pad in the southern portion of the project site, the appropriate permits from the BAAQMD would ensure that that proposed project would result in a **less than significant impact**. No mitigation measures are necessary.

CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Air Quality Emissions

Impact 3.3-6 Project development, combined with other reasonably foreseeable projects in the project vicinity, would contribute to increased air quality emissions in the air basin. This cumulative impact is considered a **significant impact.**

Cumulative air quality impacts are evaluated based on both a quantification of the project-related air quality impacts and the consistency of the proposed project with local and regional air quality plans (i.e., the *Morgan Hill General Plan* and the *BAAQMD 2000 Bay Area Clean Air Plan*). The proposed project would result in a significant cumulative air quality impact if project impacts are significant and/or the proposed project is found to be inconsistent with the *City of Morgan Hill General Plan* and/or the *BAAQMD Clean Air Plan*. In addition to the above significance criteria, the BAAQMD has established thresholds of significance for construction and operational emissions associated with development projects.

At the local level, future cumulative traffic conditions would not result in any violation of a CO standard. As a result, there would not be a cumulative impact to localized air quality emissions. At the regional level, long term operational emissions associated with traffic generated by the proposed project are predicted to be above the significance thresholds established by the BAAQMD as shown in **Table 3.3-4**, and therefore, would result in a

cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard.

The BAAQMD is the regional agency responsible for overseeing compliance with State and Federal laws, regulations, and programs within the San Francisco Bay Area Air Basin. The BAAQMD, with assistance from the Association of Bay Area Governments and the Metropolitan Transportation Commission, has prepared and implements specific plans to meet the applicable laws, regulations, and programs. Among them are the *Carbon Monoxide Maintenance Plan* (1994), *Bay Area Clean Air Plan* (2000), and the *2001 Ozone Attainment Plan* (currently under review for approval by EPA). The BAAQMD has also developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality impacts. In formulating compliance strategies, the BAAQMD relies on planned land uses established by local general plans. When a project proposes to change planned uses, by requesting a general plan amendment, the project may depart from the assumptions used to formulate BAAQMD in such a way that the cumulative result of incremental changes may hamper or prevent the BAAQMD from achieving its goals. This is because land use patterns influence transportation needs, and motor vehicles are the primary source of air pollution.

The project site has a General Plan designation of 'Commercial' in the *City of Morgan Hill General Plan* and a zoning designation of 'PUD (HC)' in the *City of Morgan Hill Planning and Zoning Codes*. The *City of Morgan Hill General Plan* designates the project site as the location of a sub-regional commercial site and the proposed project is consistent with the *City of Morgan Hill General Plan* designation. The proposed project would include a General Plan Amendment (GPA) for the relocation of a future collector street extending from Mission View Drive north of Cochrane Road instead of extending from De Paul Drive (formerly St. Louise Drive) as designated on the *City of Morgan Hill General Plan* map. This amendment is not likely to interfere with population projections or change vehicle miles traveled in Morgan Hill. The project is proposing a retail center that would serve the needs of the population. It is unlikely to interfere with region-wide population or vehicle miles traveled projections that are used in Clean Air planning efforts. However, because the proposed project results in significant emissions of air pollutants that affect regional air quality, it is considered to result in a **significant cumulative unavoidable impact** that cannot be mitigated to a less than significant level.

REFERENCES/DOCUMENTATION

Bovee Environmental Management, Inc. *Asbestos and Lead-Based Paint Reconnaissance, 66 Acre Property: NEC Hwy 101 & Cochrane Road, Morgan Hill, California*. February 2005.

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